

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF INDIANA
INDIANAPOLIS DIVISION**

STAVANGER HOLDINGS, LTD and KARL
ANDERSEN,

Plaintiffs,

V.

CASE NO. 1:12-cv-0646 WTL-DKL

TRANEN CAPITAL, LTD., TRANEN
CAPITAL ALTERNATIVE INVESTMENT
FUND, LTD., THE LEO GROUP, LLC,
KENNETH A. LANDGAARD, AND
ARTHUR L. BOWEN,

Defendants.

MOTION FOR PROTECTIVE ORDER

Defendants Tranen Capital, Ltd., Tranen Capital Alternative Investment Fund, Ltd., Kenneth A. Landgaard, and Arthur L. Bowen, by counsel, pursuant to F.R.Civ.P. Rule 26 (c), hereby move the Court for an order that their depositions not go forward on October 15 and 16, 2013, as noticed by Plaintiffs, and not be taken until after such time as the pending motion for judgment on the pleadings and motion to compel discovery have been ruled upon. The grounds for this motion are that resolution of the pending motions will clarify the issues for discovery and protect the defendants from multiple depositions.

Counsel for Tranen and Evangelos Michailidis, one of the attorneys representing Plaintiffs, made a good-faith effort to informally resolve the deposition postponement issue on September 10, 2013, and again on October 2, 2013, but were unable to reach agreement.

The grounds for the motion are set forth more fully in the accompanying supporting memorandum.

FROST BROWN TODD LLC

By: s/ Thomas E. Satrom

Thomas E. Satrom, #20745-49

Attorneys for Defendants Kenneth A.
Landgaard, Arthur L. Bowen, Tranen
Capital, Ltd., and Tranen Alternative
Investment Fund, Ltd.

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of October, 2013, a copy of the foregoing was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

Ryan M. Hurley
FAEGRE BAKER DANIELS LLP
300 North Meridian Street, Suite 2700
Indianapolis, IN 46204
ryan.hurley@FaegreBD.com

T. Joseph Wendt
BARNES & THORNBURG LLP
11 South Meridian Street
Indianapolis, IN 46204
jwendt@btlaw.com

Mauro M. Wolfe
Evangelos Michaildis
DUANE MORRIS LLP
1540 Broadway
New York, NY 10036-4086
mmwolfe@duanemorris.com
emichaildis@duanemorris.com

s/ Thomas E. Satrom

FROST BROWN TODD LLC
201 North Illinois Street, Suite 1900
P.O. Box 44961
Indianapolis, IN 46244-0961
317-237-3800
Fax: 317-237-3900
tsatrom@fbtlaw.com